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October 19, 2020

BY ECF

Honorable Edgardo Ramos
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: **Ortiz Ochoa v. Prince Deli Grocery Corp. et al.**
Case No. 18-cv-9417

Dear Judge Ramos:

This office represents Plaintiff in the above referenced matter. We write jointly with Defendants' counsel to respectfully request a 45-day extension of fact discovery and adjournment of the conference currently set for October 20, 2020. This is the third request of its nature. All previous requests were granted.

The reason for this request is that Defendants are still in the process of answering Plaintiffs' First Request for the Production of Documents and First Set of Interrogatories, served on July 10, 2020. Parties thus request an extension to allow Defendants to complete these requests and allow Plaintiffs time to conduct depositions.

Thus, the Parties respectfully request that: (i) the fact discovery completion deadline & non-expert deposition completion deadline be extended from October 19, 2020 until December 3, 2020 and (ii) the October 20, 2020 case management conference be adjourned to a date and time set by the Court after December 3, 2020.

We thank the Court for its attention to this matter

Respectfully Submitted,

/s Clela Errington

Clela A. Errington, Esq.

Cc: All counsel via ECF

February 23, 2010

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